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UNITED STATES OF AMERICA POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

St. Olaf Post Office St. Olaf, Iowa Docket No. A2012-27

REPLY BRIEF OF THE PUBLIC REPRESENTATIVE

December 23, 2011

On October 20, 2011, the Commission received two petitions to review the Postal Service's decision to close the St. Olaf post office in St. Olaf, Iowa (St. Olaf post office). A third petition was received on October 26, 2012. On October 27, 2011, the Commission issued Order No. 932, which institutes the current review proceeding, appoints a Public Representative, and establishes a procedural schedule. In accordance with Order No. 932, the Postal Service filed the administrative record for the closing. The Postal Service filed comments concerning the appeal.

The Public Representative's Reply Brief is written to bring issues to the attention of the Commission to better inform the Commission in completing its review.

The Final Determination indicates the postmaster was reassigned on July 23, 2005. Administrative Record. Item No. 47. The calculation of economic savings based

¹ Petition for Review received from Dan Stewart regarding the St. Olaf, IA Post Office 52072, October 20, 2011; Petition for Review received from Adam Meyer, Mayor & City Council of St. Olaf regarding the St. Olaf, IA Post Office 52072, October 20, 2011.

² Petition for Review received from Sheri Koons regarding the St. Olaf, IA Post Office 52072, October 26, 2012. Letters from concerned citizen also were filed in this docket. Letters Received from Concerned Citizens of St. Olaf, IA, October 31, 2012.

³ Notice and Order Accepting Appeal and Establishing Procedural Schedule, October 27, 2011 (Order No. 932).

⁴ United States Notice of Filing, November 4, 2011 (Administrative Record). The Final Determination appears as item 47 of the Administrative Record.

⁵ Comments of the United States Postal Service, December 16, 2011; see also Errata to Comments of United States Postal Service December 21, 2012 (Postal Service Comments).

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upon a postmaster salary, and not the actual salary of the OIC, remains problematic and likely inflates any economic benefit that the Postal Service will realize by closing this office. The economic benefit further assumes that the OIC will be terminated and not reassigned.

The Postal Service's Final Determination to close the St. Olaf post office appears procedurally in order. Aside from concerns that the Postal Service will not realize the cost savings it estimates, the Public Representative concludes that no persuasive argument has been presented which would prevent the Commission from affirming the Postal Service's determination to close the St. Olaf post office.

Respectfully submitted,

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